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September 15, 2023

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE: *United States v. Justin Ramirez*  
22-cr-504 (VSB)**

Dear Judge Broderick,

This letter is submitted on behalf of my client, Justin Ramirez. Mr. Ramirez seeks a 30-day adjournment of the status conference, currently scheduled for September 20, 2023, on the consent of the government. This adjournment is requested because Mr. Ramirez's state case has been adjourned until September 19, 2023, for a suppression hearing in New York Supreme Court, Bronx County. This adjournment will permit the parties to be better informed regarding the outcome of the state matter. The defense consents to the exclusion of time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161.


Thank you for considering this request.

Respectfully Submitted,



Meredith S. Heller

Cc: A.U.S.A. Brandon C. Thompson (via ECF)

**APPLICATION GRANTED  
SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 09/15/2023

The status conference scheduled for September 20, 2023 is hereby adjourned to October 27, 2023 at 10:00 a.m. The adjournment is necessary to allow the defense to keep apprised of the defendant's state case, which shares similar facts as those in this case. Also, to permit the parties to complete their discussions related to a pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between September 20, 2023 and October 27, 2023 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h) (7)(A), in the interest of justice.